

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 20 CR 362
v.	)	
	)	Judge Jorge L. Alonso
AHMAD al-SHAHMAN	)	

**UNOPPOSED MOTION FOR BOND AND PRE-SENTENCE PAYMENT**

The United States of America, by its attorney, John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, pursuant to 28 U.S.C. §§ 2041 and 2042, moves this Court for an order directing the Clerk of the Court to accept a bond payment to be held pending resolution of this matter, and a pre-sentence payment toward the criminal financial obligations to be imposed in the above-captioned case, and in support state as follows:

1. The defendant has been charged via superseding indictment with one count of tax evasion, in violation of 26 U.S.C. § 7201 and two counts of failing to file a tax return, in violation of 26 U.S.C. § 4203 (R. #7). The parties anticipate that the defendant will plead guilty, pursuant to a written plea agreement, to tax evasion (Count Three) from the Netherlands where he is currently detained pending extradition. In order to facilitate the change of plea, the government will withdraw the extradition request and the defendant will plead guilty upon release by the Dutch authorities. In order to ensure that the defendant does not flee prior to his change of plea hearing, the defendant has agreed to post a \$150,000 cash bond with the Clerk of the Court. The parties have agreed that, upon the filing of the Judgment and

Conviction Order, the cash bond will be returned to defendant's counsel who will in turn return the bond to the defendant.

2. In addition, pursuant to the written plea agreement, the defendant will submit his restitution payment to the Clerk of the Court prior to the change of plea hearing.

3. Defendant has further agreed to pay the \$100 special assessment prior to the change of plea hearing.

4. Defendant or another representative party may submit payment by cash, cashier's check, or money order made payable to the Clerk of the Court with 20 CR 362 noted on each payment mailed or delivered to:

Clerk of the Court for the Northern District of Illinois  
219 South Dearborn Street, 20th Floor  
Chicago, Illinois 60604

5. Pursuant to 28 U.S.C. § 2041, the defendant or another representative party are authorized to pay such funds into the Court Registry, and the Clerk of Court is authorized to accept and hold such funds until the time of sentencing.

6. Further, pursuant to 28 U.S.C. § 2042, the United States requests an order that upon the entry of a criminal judgment in this case, the Clerk of the Court is to withdraw and apply the deposited funds to the criminal financial obligations imposed against the defendant.

WHEREFORE, the United States moves this court for an order directing the Clerk of the Court to: 1) accept payment of a \$150,000 cash bond from defendant or any other representative party, and to return the bond to counsel for defendant upon

entry of the Judgment and Conviction order; and 2) accept a restitution and special assessment payment from the defendant, or any other representative party, pending entry of the Judgment and Conviction order in this case, and thereafter to withdraw and apply the deposited funds to the defendant's criminal financial obligation.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

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Dated: February 9, 2021